

AARON D. FORD  
Attorney General  
IAN E. CARR, Bar No. 13840  
Deputy Attorney General  
State of Nevada  
Bureau of Litigation  
Public Safety Division  
100 N. Carson Street  
Carson City, Nevada 89701-4717  
Tel: (775) 684-1259  
E-mail: icarr@ag.nv.gov

*Attorneys for Defendants  
Tara Carpenter, E.K. McDaniel,  
and Mark Sorci*

<input checked="checked" type="checkbox"/> FILED	<input type="checkbox"/> RECEIVED
<input type="checkbox"/> ENTERED	<input type="checkbox"/> SERVED ON
COUNSEL/PARTIES OF RECORD	
MAY 13 2019	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY _____

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

JAMES M. PINEDA,

Plaintiff,

v.

E.K. MCDANIEL, et al.,

Defendants

*ORDER*  
Case No. 3:17-cv-00196-RCJ-CBC

**MOTION FOR EXTENSION OF TIME  
TO FILE DISPOSITIVE MOTIONS**

**(First Request)**

Defendants, Tara Carpenter, E.K. McDaniel, and Mark Sorci (Defendants), by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada, and Ian E. Carr, Deputy Attorney General, hereby submit their Motion for Extension of Time to File Dispositive Motions. This Motion is based on Federal Rule of Civil Procedure 6(b)(1)(A), the following Memorandum of Points and Authorities, and all papers and pleadings on file in this action.

**MEMORANDUM OF POINTS AND AUTHORITIES**

**I. ARGUMENT**

Defendants respectfully request a thirty (30) day extension of time out from the current deadline (May 8, 2019) to file dispositive motions in this case. Defense counsel is confronted with numerous competing deadlines and a high workload due to staffing

1 changes in the Office of the Attorney General. However, such obstacles are currently  
2 being resolved and the requested extension of time should afford Defendants adequate  
3 time to file dispositive motions in this case.

4 Federal Rule of Civil Procedure 6(b)(1) governs extensions of time and provides as  
5 follows:

6 When an act may or must be done within a specified time, the  
7 court may, for good cause, extend the time: (A) with or without  
8 motion or notice if the court acts, or if a request is made, before  
9 the original time or its extension expires; or (B) on motion made  
after the time has expired if the party failed to act because of  
excusable neglect.

10 Defendants' request is timely and its limited nature will not hinder or prejudice Plaintiff's  
11 case, but will allow for a thorough briefing to narrow or eliminate issues in this case. The  
12 requested thirty (30) day extension of time should permit Defendants time to adequately  
13 research draft, and submit dispositive motions in this case. Defendants assert that the  
14 requisite good cause is present to warrant the requested extension of time.

15 For these reasons, Defendants respectfully request a thirty (30) day extension of  
16 time from the current deadline to file dispositive motions in this case, with a new  
17 deadline to and including Friday, June 7, 2019.

18 DATED this 8th day of May, 2019.

19 AARON D. FORD  
20 Attorney General

21 By: 

22 IAN E. CARR  
23 Deputy Attorney General  
24 State of Nevada  
Bureau of Litigation  
Public Safety Division  
*Attorneys for Defendants*

25 IT IS SO ORDERED.

26   
27 U.S. MAGISTRATE JUDGE

28 DATED: 5/13/2019